



April 3, 2009

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: Additional *Ex Parte* Comments of Expand Networks, Inc., regarding the Rural Broadband Strategy GN Docket No. 09-29 (DA 09-561)

Dear Ms. Dortch:

Expand Networks, Inc. respectfully recommends that the national rural broadband strategy include the use of Wide Area Network (WAN) Optimization technologies, as appropriate, to optimize existing networks in bandwidth-constrained rural communities by creating virtual bandwidth capacity and enabling the implementation of broadband-dependent applications. Leveraging existing infrastructure is one of the most rapid ways for federal agency programs and resources to best respond to rural broadband requirements and overcome obstacles that impede its deployment.

Where bandwidth is otherwise inadequate to support rural business, distance learning, telemedicine and public safety communications, virtual bandwidth, created by WAN Optimization, can enable robust broadband performance - even where link speeds are 128kbps or lower.<sup>1</sup> The benefits of WAN Optimization technologies are especially pronounced for the delivery of broadband over satellite, cellular and other bandwidth constrained networks. WAN Optimization technologies increase the virtual bandwidth of networks; increase the value of network investment, lower network operating and recurring costs, while simultaneously enabling greater network access and usage with faster application performance.

By lowering operating and recurring costs, the network becomes more affordable to a larger number of subscribers. Optimization technologies immediately can help bandwidth-constrained rural communities add users to their limited networks while delivering robust application performance and the benefits of Broadband.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "HT", written over a horizontal line.

Howard Teicher  
Vice President, Public Sector & Satellite Markets

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<sup>1</sup> See Summary of Expand Networks, Inc. April 1, 2009 *Ex Parte* Meeting submitted pursuant to DA 09-668, GN Docket No. 09-40 and additional comments regarding the definition of 'Broadband.'